

## **REMARKS**

Claims 44-47 are added. Claims 1-18 and 28-47 are in the application for consideration.

The specification is amended to correct a typographical error. Entry of the same is requested.

The claims as presently presented are allowable over the prior art. Applicant's independent claim 1 requires exposure of the substrate to a third gaseous substance different from the first and second precursors effective to selectively remove the reaction product from the substrate relative to the second species monolayer. Applicant's independent claim 28 requires selectively removing the undesired impurity from the substrate relative to the second species monolayer by the act of exposing the substrate to a gaseous substance "c" which is different from precursors "a" and "b". It is not inherent nor suggested in the prior art that the combination of Brabant et al. with Applicant's allegedly admitted prior art would result in any selective removal of anything relative to another material.

Applicant's allegedly admitted prior art in no way teaches the selective removal of one material relative to another, in fact not teaching any removal of any material but rather the undesired formation of a material. Brabant et al. is not seen to anywhere disclose selectivity in a removal action. Neither reference relied upon by the Examiner is inherent in these regards, and a combination of

the references does not result in inherency or obviousness of Applicant's claim over the alleged prior art which the Examiner combines.

The fact that a certain result or characteristic may occur or be present in the prior art is not sufficient to establish the inherency of that result or characteristic. To establish inherency, intrinsic evidence must make clear that the missing descriptive matter is necessarily present in the thing described in the reference, and that it would be so recognized by persons of ordinary skill. However, inherency may not be established by probabilities or possibilities. The mere fact that a certain thing may result from a given set of circumstances is not sufficient. (MPEP § 2112(IV)). The combining of the two references upon which the Examiner relies does not necessarily result in the act of selectively removing one material relative to another, as is explicitly recited in Applicant's independent claims 1 and 28. Brabant et al. in no way discloses or suggested the stated claims 1 and 28 acts to selectively remove the stated reaction product or undesired impurity during an overall deposition process within the chamber within which the deposition occurs. Applicant's allegedly admitted prior art is also lacking in this regard. For at least these reasons, the Examiner's rejection of Applicant's independent claim 1 and 28 is in error and should be withdrawn.

Further, with respect to the rejection of claims 16-18, the Examiner asserts that such claim "inherent properties of the first reactant". Such is in no way true as a required limiting factor with respect to that which Applicant recites. Rather, Applicant states in the specification that such is a preferred act, not an inherent or required act. Under no conceivable stretch of the imagination does either of

the alleged cited prior art references upon which the Examiner relies suggest that which Applicant recites in claims 16-18. The Examiner's rejection of such claims in this regard does not even constitute *prima facie* obviousness. No prior art has been cited wherein any preferential adsorption to substrate material other than the second species monolayer occurs or is suggested. Accordingly, it is respectfully asserted that the Examiner must find other prior art, or point to specific sections in the existing cited art to support the Examiner's rejection of Applicant's dependent claims 16-18.

Applicant's remaining dependent claims should be allowed as depending from allowable base claims, and for their own recited features which are neither shown nor suggested in the cited art.

Applicant's added dependent claims 44-47 recite that certain of the stated monolayers, reaction product, and/or undesired impurity comprise oxygen. Accordingly, such claims by definition in combination with their respective independent claims require the formation of one material comprising oxygen and the removal of another material comprising oxygen selectively relative to the one. Brabant et al. clearly teaches the desirability of use of its process, at least with respect to HF, in the formation of oxide-free surfaces (i.e., [0009]). Accordingly, the combination of Brabant et al. with Applicant's admitted prior art would clearly defeat a purpose of Brabant et al. of providing no oxygen-containing material on a substrate. As the combination of references defeats a primary purpose of Brabant et al., Applicant's dependent claims 44-47 should be

allowed for this reason and in addition being dependent from allowable base claims.

This application is believed to be in immediate condition for allowance.

Respectfully submitted,

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By: 

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